

June 2, 2008

Mr. Tim Taylor
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road
San Diego, CA 92123

**Subject: Addendum to Land Use Compatibility Report for R04-017; STP 06-004;
Log No. 04-09-014— Parking Rezone**

Dear Mr. Taylor:

The letter report prepared by Jones & Stokes and dated August 31, 2007 presented an analysis of the conformance of the proposed project with the Valley Center Community Plan and the Special Circumstances Findings required by the San Diego County General Plan. Please note the following change to the height of the light fixtures indicated on page 4 in the August 2007 report (indicated in strikeout and underline below).

Scale & Bulk—The proposed parking use will have no apparent scale or bulk because it requires only the paving of the ground surface. The proposed light fixtures would be limited to ~~48~~25 feet in height, which is similar or lower than adjacent utility poles, trees, structures and play field facilities. Vehicles using the parking lot are typically less than 6 feet tall and would be the same height as vehicles using the surrounding roads and parking areas. The proposed earthen berms boulder groupings and dense landscape screening using a variety of groundcover, low shrubs and a mixture of evergreen, deciduous and flowering trees around the perimeter of the parking lot would adequately block views of the paving, vehicles and light fixtures.

This change would not change the conclusions of the report, especially those relating to aesthetics/visual impacts. Please contact me at 858.578.8964 if you have any questions or concerns.

Respectfully submitted,



Russell E. Hunt
Principal Planner

August 31, 2007

Mr. Devon Muto
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road
San Diego, CA 92123

Subject: R04-017; STP 06-004; Log No. 04-09-014 - Parking Rezone—Land Use
Compatibility

Dear Mr. Muto:

This letter report presents an analysis of the conformance of the proposed project with the Valley Center Community Plan and the Special Circumstances Findings required by the San Diego County General Plan. A brief Alternative Parking Lot Parcel Analysis is attached as Appendix A.

Project Compliance With Valley Center Community Plan

Introduction

The proposed rezone to allow for the parking land use must be evaluated in light of the Policies/Recommendations in the Valley Center Community Plan. The rationale for conformance with the pertinent portions of the Community Plan is described below. Other pertinent policies and recommendations were identified in the Community Plan under the Circulation, Conservation, and Noise Chapters, however, because the proposed project is consistent with these other sections of the Community Plan, they are not addressed in these findings.

- **Land Use Policy/Recommendation B.9: Buffer residential areas from incompatible activities, which create heavy traffic, noise, odors, dust, and unsightly views through use of landscaping and preservation of open space.**

The proposed parking use will be screened with dense landscaping around the perimeter of the parking area. The paved parking area will be located east of School Bus Road, which creates a buffer of approximately 500 feet from the residential area adjacent to the western parcel boundary to the paved parking area. The design review criteria for the Site Plan required by the “D” Special Area Designator will prohibit parking from being located west of School Bus Road. Thus, this open buffer area will be undeveloped and enhance the buffering effect for the residential area to the west. Residential areas to the north and east of the parking area are on the opposite side of Circulation Element roads

from the parking area and will be screened with dense landscaping. The Valley Center Middle School to the south is not a residential area.

- **Commercial Policy/Recommendation 2: Require new commercial development to comply with the adopted Design Guidelines for Valley Center, including, but not limited to, the retention of significant natural features characteristic of the community's landscape. Existing topography, land forms, drainage courses, rock outcroppings, vegetation and viewshed shall be incorporated in the design of the future development of commercial land via the "D" special area designator.**

The proposed parking use will not affect any existing topographic features, land forms, drainage courses, rock outcrops or vegetation because the project site is an existing level land form with no drainage courses, rock outcrops or significant vegetation. The proposed parking lot will be screened by a minimum of 20 feet of dense screening landscaping along Valley Center and Lake Welford Roads. The incorporation of the "D" Special Area Designator will require site plan review and be evaluated under the Design Guidelines for Valley Center.

- **Commercial Policy/Recommendation 3: Ensure that all commercial areas are served by Circulation Element roads or local roads, which meet the standards of the County of San Diego. Whenever possible, require new commercial development to provide secondary road access as opposed to access from major through roads.**

The proposed parking use occupies a corner lot that has substantial frontage on two Circulation Element roads, Valley Center Road and North Lake Welford Road. The parking lot has been designed to gain its primary access from an existing secondary road (School Bus Road). The only direct access to any major through road is a right-turn-only egress to North Lake Welford Road.

- **Commercial Policy/Recommendation 4: Commercial and civic uses shall be located in areas which not only have adequate roads for circulation but also provide easy and safe pedestrian and bicycle access.**

Valley Center and North Lake Welford Roads operate at acceptable levels of service and provide adequate access to the parking area. With the construction of the fully funded signal, the Valley Center Road/North Lake Welford Road intersection will also operate at an acceptable level of service. The nearby Valley View Casino is a destination for pedestrians or bicyclists, not the parking lot. However, the shuttle service to the Casino from the parking lot would provide easy and safe access to both casino patrons and employees arriving and departing from the adjacent bus stop on Valley Center Road. In addition, the proposed parking use will improve pedestrian and bicycle access by extending sidewalks and improving pathways along both Valley Center Road and North Lake Welford Road.

- **Commercial Policy/Recommendation 6: Commercial/civic uses shall not interfere either functionally or visually with adjacent land uses or the rural atmosphere of the community.**

The proposed parking use will be screened with dense landscaping, berms and boulders around the perimeter of the parking area. The parking area will be located approximately 500 feet from the western parcel boundary. No parking use will be included for this area on the Site Plan that will be required by the "D" Special Area Designator. Thus, this open buffer area will add to the effect of the landscape buffer. In addition, traffic patterns will not be affected in the area because access to the parking area is provided from the existing School Bus Road and no additional intersections will be created along Valley Center Road. Potential conflicts with school busses will be avoided by providing a separate point of egress to North Lake Wolford Road rather than use School Bus Road for the exit.

Dense plantings of trees and shrubs can be expected to block light from the light fixtures within one or two years of installation. In addition, the distance between the parking lot light fixtures and the parcels across Valley Center and North Lake Wolford Roads will be a minimum of 120 feet. This distance, and the fact that both Valley Center and North Lake Wolford Roads are busy Circulation Element Roads with their own inherent light impacts, will be adequate to eliminate light spillage from the low-pressure sodium cut-off type light fixtures to adjacent parcels.

Light impacts to the parcels located to the west of the parking lot will be mitigated by dense perimeter landscape screening and approximately 500 feet of buffer area between the parking lot and adjacent parcels.

The Valley Center Middle School located to the south of the parking lot is not a sensitive receptor for light created by the parking lot lighting and lighting impacts from the parking lot would not be materially detrimental.

- **Commercial Policy/Recommendation 8: Discourage commercial and civic uses outside the Country Towns and limit all such uses to those that are clearly demonstrated as needed and which are compatible with the rural lifestyle of the Valley Center Community Plan.**

The primary purpose of the parking lot is to provide needed parking for the employees of the nearby Valley View Casino. Developing a parking lot within the Country Town would be inconvenient to the employees and would impact the Country Town businesses and intervening properties with employee traffic and shuttle busses. With the proposed landscape screening and adjacent undeveloped open areas to the west and east of the parking use, the proposed parking use will be compatible with the existing land uses in the vicinity.

San Diego County General Plan Special Circumstance Findings

Introduction

The project site is located within the Estate Development Area (EDA) regional land use category of the Land Use Element and is designated in the Valley Center Community Plan as the (17) Estate land use designation. The proposed rezone to the S-86 Use Regulation to allow for the proposed parking land use is compatible with the (17) Estate land use designation when Special Circumstances Findings can be made. Draft Special Circumstances Findings are made below.

Land Use Factors

Compatibility with Surrounding Land Uses:

- **The location, size, design and operating characteristics of the proposed use will be compatible with and will not adversely affect or be materially detrimental to adjacent uses, residents, buildings, or structures, with consideration given to:**
 - Harmony in scale, bulk, coverage and density:

Scale & Bulk—The proposed parking use will have no apparent scale or bulk because it requires only the paving of the ground surface. The proposed light fixtures would be limited to 18 feet in height, which is similar or lower than adjacent utility poles, trees, structures and play field facilities. Vehicles using the parking lot are typically less than 6 feet tall and would be the same height as vehicles using the surrounding roads and parking areas. The proposed earthen berms boulder groupings and dense landscape screening using a variety of groundcover, low shrubs and a mixture of evergreen, deciduous and flowering trees around the perimeter of the parking lot would adequately block views of the paving, vehicles and light fixtures.

Coverage—The proposed parking use would cover approximately 150,000 square feet (3.5 acres and 36 percent of the parcel) with asphalt pavement and approximately 32,500 square feet (0.8 acre and 8 percent of the parcel) with landscaping. The parcel is 9.45-acre (411,600 square feet) in size. The adjacent playground facilities for the Valley Center Middle School have two large expanses of asphalt pavement that are approximately 35,000 and 45,000 square feet in addition to the paved School Bus Road. The approximately 80,000 total square feet of asphalt pavement covering these areas is of a smaller, but comparable size and dimension as the proposed parking lot pavement. Nearby greenhouse structures across Valley Center Road cover almost 100 percent of that parcel. The proposed landscape screening around the perimeter of the parking lot would adequately block views of the paving and parked vehicles.

Density—The proposed parking use will create no residential density.

❑ The availability of public facilities, services and utilities;

The few public facilities, services and utilities needed for the proposed parking use are available. Valley Center Road, North Lake Wohlford Road and the intersections adjacent to the parking lot will operate at acceptable levels of service when the fully funded traffic signal at the Valley Center Road/North Lake Wolford Road intersection is completed in 2006 and provide adequate ingress and egress to the parking lot. The proposed parking lot shall not be used until construction of the Valley Center Road/North Lake Wohlford intersection is completed. Full-time security services provided by the Valley View Casino will provide for public safety. Electrical power to provide energy for the proposed permanent light fixtures to illuminate the parking lot and water to irrigate the proposed screening landscaping is available adjacent to the site. No other public facilities, services or utilities are needed.

❑ The harmful effect, if any, upon desirable neighborhood character;

Air quality and noise impact studies have been completed to document that air quality and noise impacts created by the proposed parking use would not exceed California standards for carbon monoxide or County of San Diego Noise Ordinance thresholds.

The parking lot will have outdoor lighting for the safety of the casino employees, however, the lighting has been designed to reduce lighting impacts to the surrounding neighborhood by using low-pressure sodium light sources and fully shielded cutoff light fixtures in conformance with the Light Pollution Ordinance and Title 24, Parts 1 & 6 of the California Code of Regulations. The site plan required by the “D” and “B” Special Area Regulations will be designed to adequately screen the light fixtures. The twenty-foot wide landscape buffer along the Valley Center Road and North Lake Wolford Road frontages will include earthen berms and boulder groupings to block low level lighting created by headlights. Dense plantings of trees and shrubs can be expected to block light from the light fixtures within one or two years of installation. In addition, the distance between the parking lot light fixtures and the parcels across Valley Center and North Lake Wolford Roads will be a minimum of 120 feet. This distance, and the fact that both Valley Center and North Lake Wolford Roads are busy Circulation Element Roads with their own inherent light impacts, will be adequate to eliminate light spillage from the low-pressure sodium cut-off type light fixtures to adjacent parcels. The Lighting Analysis completed for the project determined that the lumens created by the outdoor lighting fade to less than 0.01-foot candles (fc) (a full moon creates 0.02-fc of light) within 70 feet of the edge of the parking lot, without obstructions such as dense landscaping. The dense landscape buffer will additionally reduce lighting impacts.

Light impacts to the parcels located to the west of the parking lot will be mitigated by dense perimeter landscape screening and approximately 500 feet of buffer area between the parking lot and adjacent parcels.

The Valley Center Middle School located to the south of the parking lot is not a sensitive receptor for light created by the parking lot lighting and lighting impacts from the parking lot would not be materially detrimental.

Full-time security personnel provided by the Valley View Casino will assure that illegal or disruptive activities will not be allowed within or adjacent to the parking area. Due to the use of the parking lot by employees of the Casino, the operation of the parking lot will coincide with the existing operation of adjacent roads in that both peak activity and relative inactivity in the parking lot will coincide with the existing peak traffic activity and inactivity on the adjacent streets.

❑ The generation of traffic and the capacity and physical character of surrounding streets, and to:

While the proposed parking use does not generate traffic by creating a destination for trips, it does affect traffic operations on Valley Center Road and North Lake Wohlford Road between the parking lot and Valley View Casino. Valley Center Road, North Lake Wohlford Road and the intersections adjacent to the parking lot will operate at acceptable levels of service within this limited area and provide adequate ingress and egress to the parking lot from the Casino. With completion of the fully funded intersection improvements and signal at the Valley Center Road/North Lake Wohlford Road intersection to be completed in 2006, this intersection will operate at an acceptable level of service.

❑ Any other relevant impacts of the proposed use.

Valley Center Middle School has historically used this parcel for parking during large events. Groups that use the nearby playing fields also park on this parcel. With the paving and expansion of the parking lot, less fugitive dust will be created.

The project site is adjacent to a variety of commercial, civic and institutional land uses that create a neighborhood character that is less rural and agricultural than most neighborhoods in Valley Center. An analysis of surrounding land uses identified five existing commercial, civic or institutional land uses that are adjacent to the proposed parking lot and two other nearby commercial or institutional land uses.

An Alternative Parking Lot Parcel Analysis was completed to determine if any nearby parcels would be more appropriate for the parking land use. Several nearby parcels, including San Pasqual Reservation property, were evaluated in terms of safe access,

topographic limitations, biological resources, and land use compatibility. None of the parcels considered as an alternative parking lot site are more desirable for the proposed employee parking use than the proposed site.

- **The impacts and the location of the proposed use will not adversely affect the San Diego County General Plan, and;**

Typical uses in the (17) Estate Residential Land Use Designation include single-family residential and agricultural land uses. However, the proposed rezone to the S86 Use Regulation that allows for the proposed parking use is consistent with the (17) Estate Residential Land Use Designation of the General Plan when Special Circumstances are found to exist.

- **The proposed use at its proposed location will provide a service or facility, which will not be detrimental to the general well being of the surrounding neighborhood or community.**

The proposed parking use will not be detrimental to the surrounding neighborhood because the Site Plan required by the "D" Special Area Designator will guarantee that the proposed use is adequately screened to be compatible with the rural agricultural character of the surrounding neighborhood. Paving of the parking area will reduce the generation of fugitive dust created by the use of this parcel by the Valley Center Middle School for parking during large events and by groups that use the nearby playing fields. Adequate and safe ingress and egress is provided to the proposed use by an existing private road (School Bus Road) and the proposed right-turn-only egress to North Lake Wolford Road. No new intersections are created along Valley Center Road.

Community Need Factors

- **Need for this use. There is an identified need in the general area for the proposed use.**

The Valley View Casino is located within the community of Valley Center and provides employment and entertainment for a significant number of Valley Center residents. The proposed parking lot will provide a place for employees to park that is safe during the day and night, convenient to access from Valley Center and other adjacent communities, and close enough to the Casino for short shuttle bus service. Because a majority of the employees will arrive and depart to the west on Valley Center Road, employees will drive less distance and impact the Valley Center Road/North Lake Wolford Road intersection less than if they parked at the Casino.

The current construction activity associated with the expansion of the Casino has reduced the amount of parking available for both Casino patrons and employees as well as created

the need for additional future parking. Due to a number of constraints within the existing Trust Lands, including steep rocky terrain, allocation of land to tribe members for residential use and use of land for tribal facilities, land suitable for parking is not available within close proximity of the Casino.

- **Availability of appropriately zoned land. There is insufficient land suitably designated in the general area to meet the identified need, and implementation of the proposed use will not result in a scarcity of land for those uses permitted under consistent use regulations.**

The S86 use regulation is rarely utilized because of the limited and specialized uses allowed. Several suitably zoned parcels of land that allow for the parking land use are available in the general area, however, they are either too small for the parking use or less suitable for the parking use than the proposed site due to a variety of factors addressed in the Alternative Parking Lot Parcel Analysis prepared for the proposed parking lot. These factors included the long distance from the parcel to the Casino entrance, taking access to the parcel from sharply curving portions of Woods Valley Road and that acquisition of the parcel would be expensive and difficult due to the current commercial land use. The implementation of the proposed use will remove land designated and zoned for agricultural and single-family residential uses, however hundreds of acres of land that is zoned and suitable for agricultural and single-family uses are available in the general area.

Physical/Environmental Factors

- **Physical constraints. Site characteristics make it physically impossible or economically unfeasible to implement the uses allowed in consistent use regulations. Physical constraints shall include, but not be limited to, lot configuration and size, topography, drainage, adjacent land use, access opportunities, traffic congestion, noise, air pollution, vibration and other factors affecting general health, safety and welfare.**

No site characteristics exist that make it physically impossible or economically unfeasible to implement the agricultural and residential land uses allowed by the A70 Use Regulation. However, it should be noted that noise impacts from both the Circulation Element roads adjacent to two sides of the parcel as well as the Valley Center Middle School would affect all of the single-family building sites that could be created on this parcel. In addition, providing driveway access from multiple single-family residential lots directly to Circulation Element roads would be undesirable.

- **Facilities availability. Essential services and facilities will be available concurrent with need.**

The few public facilities, services and utilities needed for the proposed parking use are available. Valley Center Road, North Lake Wohlford Road and the intersections adjacent to the parking lot will operate at acceptable levels of service when the fully funded signal at the Valley Center Road/North Lake Wolford Road intersection is installed and provide adequate ingress and egress to the parking lot. Full time security services provided by the Valley View Casino will provide for public safety. Electrical power to provide energy for the proposed lighting and water to irrigate the proposed screening landscaping is available adjacent to the site. No other public facilities, services or utilities are needed.

- **Mitigation of environmental impacts. There are feasible mitigation measures that can be implemented to mitigate significant environmental impacts and ensure compatibility of permitted uses with adjacent land uses.**

The Site Plan required by the "D" Special Area Designator will guarantee that the proposed use is adequately screened to be compatible with the rural agricultural character of the surrounding neighborhood. Conditions of approval for the Site Plan that regulate the operation of the parking lot will also guarantee that the screening landscaping is adequately maintained, lighting is shielded from adjacent properties and noise levels do not exceed the County Noise Ordinance.

I trust that this land use compatibility analysis and the attached analysis of potential alternative parking lot parcels will meet your needs. Please let me know if you have any questions or concerns.

Respectfully submitted,



Russell E. Hunt
Principal Planner

Enclosure: Appendix A